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(Additional counsel appear on signature page)

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

Cung Le, Nathan Quarry, and Jon Fitch, Brandon
Vera, Luis Javier Vazquez, and Kyle Kingsbury,
on behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant.

Case No.: 2:15-cv-01045-RFB-(PAL)

**PLAINTIFFS' MOTION FOR LEAVE TO
LODGE MATERIALS UNDER SEAL**

1 Pursuant to Rules 5.2 and 26(c) of the Federal Rules of Civil Procedure, Local Rule IA 10-5(a),
2 and Section 14.3 of the Revised Stipulation and Protective Order (the “Protective Order”) issued in this
3 action on February 10, 2016 (ECF No. 217 at 15), Plaintiffs Cung Le, Nathan Quarry, Jon Fitch,
4 Brandon Vera, Luis Javier Vazquez, and Kyle Kingsbury, on behalf of themselves and all others
5 similarly situated (collectively, “Plaintiffs”), hereby move this Court for leave to lodge certain
6 documents under seal related to Plaintiffs’ Reply in Support of Plaintiffs’ Motion for Class
7 Certification.

8 Under Section 14.3 of the Protective Order, documents designated Confidential or Highly
9 Confidential – Attorneys’ Eyes Only “shall be provisionally lodged under seal with the Court, and
10 redacted papers shall be publicly filed. Within 5 days of the materials being lodged with the Court, the
11 Party claiming protection shall file a motion to seal setting forth the bases for sealing and proper
12 authority under *Kamakana v. City & County of Honolulu*, 447 F.3d 1172 (9th Cir. 2006), or some other
13 applicable authority.” ECF No. 217 at 15.

14 The documents referenced below (or portions thereof) have been designated or refer to
15 materials which have been designated Confidential or Highly Confidential – Attorneys’ Eyes Only by
16 Defendant or third parties. Accordingly, Plaintiffs seek leave to lodge the following documents under
17 seal.

18 First, Plaintiffs seek leave to lodge under seal Plaintiffs’ Reply in Support of Plaintiffs’ Motion
19 for Class Certification.

20 Second, Plaintiffs seek leave to lodge under seal Exhibit 86 to the Cramer Declaration, which is
21 a document entitled Second Supplemental Reply Report of Hal J. Singer, Ph.D., dated May 28, 2018.

22 Third, Plaintiffs seek leave to lodge under seal Exhibit 87 to the Cramer Declaration, which
23 contains excerpts from the first deposition of Plaintiffs’ expert economist Hal J. Singer, Ph.D., taken in
24 this matter on September 27, 2017.

25 Fourth, Plaintiffs seek leave to lodge under seal Exhibit 88 to the Cramer Declaration, which
26 contains excerpts from the second day of the deposition of Zuffa’s economist Robert H. Topel, taken in
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1 this matter on December 5-6, 2017.

2 Plaintiffs have filed all of these documents under seal, in accordance with the Court's ECF
3 system, with the instant motion. Plaintiffs have publicly filed placeholders for or redacted versions of
4 these documents with the Court, and will serve un-redacted versions of these documents on Defendant,
5 in accordance with LR IC 4-1(c)(4).
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1 Dated: May 30, 2018

Respectfully Submitted,

2 By: /s/ Eric L. Cramer
3 Eric L. Cramer

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